

1 David Israel, Esq. (LSB No. 7174) (SPACE BELOW FOR FILING STAMP ONLY)  
2 Bryan C. Shartle, Esq. (LSB No. 27640)  
SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.

3 Lakeway Two, Suite 200  
3850 North Causeway Boulevard  
4 Metairie, LA 70002-1752  
Telephone: (504) 828-3700  
5 Facsimile: (504) 828-3737

6 Debbie P. Kirkpatrick, Esq. (CSB No. 207112)  
7 SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.  
3667 Voltaire Street  
8 San Diego, CA 92106  
Telephone: (619) 758-1891  
9 Facsimile: (619) 222-3667

10 Attorney for Defendant

11 UNITED STATES DISTRICT COURT

12 SOUTHERN DISTRICT OF CALIFORNIA

14 JAMES M. KINDER,	)	Case No. 07-cv-02132-DMS-AJB
	)	
15 Plaintiff,	)	Judge: Dana M. Sabraw
	)	Mag. Judge: Anthony J. Battaglia
16 -against-	)	
	)	<b>NOTICE OF MOTION;</b>
17 NATIONWIDE RECOVERY SYSTEMS, LTD.,	)	<b>MOTION TO STAY</b>
	)	<b>AND/OR FOR</b>
18 Defendant.	)	<b>PROTECTIVE ORDER</b>
	)	
19	)	Date: N/A
20	)	Time: N/A
21	)	Courtroom: N/A
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22 TO ALL PARTIES AND THEIR ATTORNEYS:

23 PLEASE TAKE NOTICE that defendant, Nationwide Recovery Systems, Ltd.  
24 ("NRS"), files this Motion to Stay and/or for Protective Order and hereby provides notice of  
25 the filing.

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1 NRS requests that the Court grant its Motion to Stay and/or for Protective Order, per  
2 Fed. R. Civ. P. 26(c), and stay all discovery in these consolidated cases filed by plaintiff,  
3 James M. Kinder, until further orders from this Court. Bryan C. Shartle, counsel for NRS, has  
4 conferred in good faith with opposing counsel in an attempt to resolve this discovery dispute  
5 without court action, but has been unsuccessful. NRS's motion is based on this notice and  
6 motion, accompanying memorandum of points and authorities, the pleadings and papers on  
7 file herein, and other such matters as may be presented to the Court at the time of the hearing.  
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9 Dated: February 11, 2008

## **Sessions, Fishman, Nathan & Israel, L.L.P.**

/s/ Debbie P. Kirkpatrick

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Debbie P. Kirkpatrick

Attorney for Defendant,

Nationwide Recovery Systems, Ltd.

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